

In the matter of RM-11306;

I am opposed to this proposal in it's entirety.

The authors started in the right direction by limiting bandwidth (legacy DSSB excepted) but, failed to carry the issue through to address the serious problem we will soon face on Amateur HF frequencies. They have avoided addressing the huge influx of new HF operators if/when the CW testing requirement is dropped. Our "parking lot" is currently full and we need to make spaces available for many more cars within the "real estate" we have. The system will collapse if the use of wide-band signals/modes continue to be used and encouraged. We can't enlarge the parking lot but, we can require the "cars" to be smaller.

It is grossly unreasonable to think that we can significantly increase the number of users and not make room for them. Amateur HF radio frequencies are extremely limited and unless the Commission has unrevealed plans to significantly expand them, emission width on these bands must be reduced. Currently, experimenting on/for Amateur radio appears to mean "wider is better". That, however, is exactly opposite the direction necessary. The "experimenters" need to focus on narrower bandwidth signals. We certainly do not need Mac trucks (e.g. Pactor III, ESSB, etc.) occupying two, three, or 16 spaces. We will no longer have the luxury of playing with "toys" that generate wide signals. If it's wide, we no longer have room for it.

In the near term, I request the FCC issue immediately issue regulations to ban emissions wider than 2.8 Khz. (current "state of the art" for SSB phone). In the long term, I request the FCC issue regulations that will require an incremental reduction in bandwidth to a predetermined, technically achievable, level (perhaps 2 Khz. for SSB phone emissions). I am certain there are intelligent, knowledgeable, and technically proficient Amateurs who can and will, with regulatory incentive, develop the needed technology. I'm sure the commercial manufacturers will also join the effort.

To prevent interference, both intentional and unintentional, I request the Commission not only regulate emission width but, also emission type. Digital and analog signals must be in separate band segments. Frequency allocations for each emission type should be allocated fairly and based on percent of use (e.g. analog phone = 60%, CW = 30%, 500 khz digital = 10%, etc.) as determined by an objective analysis conducted by a disinterested entity(s) (i.e. not the ARRL). It has been established, in actual use, that digital and analog emissions are incompatible and should not occupy the same set of frequencies.

Additionally, the Commission should ban all unattended (i.e. automated) radio station operation and require a control operator be present when the station initiates contact ... unless and until a reliable method of detecting a busy frequency is developed to ensure a clear frequency (as with the human ear). Automated "answering" stations do not now, nor in the near future, possess the capability to accurately check for a busy frequency and are currently causing interference to other stations occupying the frequency. In fact, some are currently ignoring the established ban plan and operating outside their designated frequencies thereby, causing intentional interference.

If the Commission intends to approve the elimination of CW testing, it is then the responsibility of the Commission to provide regulatory relief, in the manner recommended here, to accommodate the inevitability of a large increase in users of Amateur HF frequencies. The Commission should not shirk it's responsibility and allow the Amateur Radio Service to drown in a quagmire created by the Commission.

I implore you to deny RM-11306 and immediately begin the process of shrinking all signal bandwidths to necessary levels.

Sincerely,
Garry Rife
N5GLR
Arlington, TX